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7 Attorney for Josh Hall

8 IN THE UNITED STATES DISTRICT COURT  
9 FOR THE DISTRICT OF OREGON

10 UNITED STATES OF AMERICA,

11 Plaintiff,

12 vs.

13 JOSH HALL,

14 Defendant.

Case No.: CR 10-229 BR

DECLARATION OF NOEL GREFENSON  
IN SUPPORT OF MOTION TO CONTINUE  
TRIAL

15 Under the penalty for perjury, I, Noel Grefenson, hereby certify that the following  
16 facts are true and correct to the best of my knowledge and belief:

17 1. I am substitute counsel for defendant Josh Hall, who is charged in this case  
18 with Bank Fraud and making False Statements to a Bank in the District of Oregon. I was  
19 appointed by this Court on March 11, 2011.

20 2. Mr. Hall is out of custody pending resolution his charges.

21 3. Trial in this case is set for December 13, 2011.

22 4. The Government and the defendant have reached an agreement wherein  
23 this case will likely resolve prior to trial. The details of this agreement are not final  
24 however, due in part to the status of the co-defendant's case, which is pending a

25 1 – DECLARATION OF NOEL GREFENSON IN SUPPORT OF MOTION TO  
CONTINUE TRIAL

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1 sentencing hearing on January 13, 2012. Co-defendant's counsel has motioned the Court  
2 for a continuance of that hearing until February 13, 2012, or thereafter. The motion is  
3 active.

4 5. I would like to continue trial in this case until the result of co-defendant's  
5 sentence is known so that the parties herein can formalize the details of Mr. Hall's  
6 agreement with the Government.

7 6. I have discussed Mr. Hall's speedy trial rights with him on multiple occasions  
8 and he is aware of his rights and agrees that a continuance of his scheduled trial date is  
9 reasonable and necessary for the reasons stated above.

10 7. Counsel for the Government, Michelle Kerin, has no objection to the  
11 requested continuance.

12 8. For the reasons stated above and considering that a postponement will  
13 facilitate the fair and just resolution of this case, I maintain that under Title 18 U.S.C §  
14 3161(h)(7)(A), (B) the ends of justice served by postponement of a trial herein outweigh  
15 the interest of the public and the defendant in a speedy trial.  
16

17 Dated: December 2, 2011.

18 */s/ Noel Grefenson*

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20 Noel Grefenson, OSB No. 88216  
21 Attorney for Defendant Hall  
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